

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

RICHARD HORTON,

Plaintiff,

V.

CITY OF COLUMBUS, Columbus Division
of Police Officers BRENDA K. WALKER
(Badge #1176), MIEKO SIAS as personal
representative of the ESTATE OF SAM SIAS
(Badge #1871), and AS-YET UNKNOWN
COLUMBUS POLICE OFFICERS,

Defendants.

Case No. 23-cv-3888

Chief Judge Algenon L. Marbley

Magistrate Judge Elizabeth P. Deavers

JURY TRIAL DEMANDED

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION
OF TIME TO REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER**

Plaintiff, RICHARD HORTON, by and through his attorneys, respectfully moves for an extension of time for Plaintiff to file a reply in support of his Motion for a Protective Order (Dkt. 71), up to and including May 30, 2025. In support, Plaintiff states as follows:

1. Plaintiff filed his Motion for a Protective Order on April 18, 2025. Dkt. 71.
2. Defendants City of Columbus and Brenda Walker filed their response May 9, 2025. Dkt. 76.
3. Pursuant to Local Rule 7.2(a)(2), Plaintiff's reply is due on May 23, 2025.
4. Plaintiff's counsel has been working diligently to meet the deadline. However, due to Plaintiff's counsel other professional commitments and a family emergency, Plaintiff requires a brief extension of time to file his reply.
5. Prior to filing this motion, and pursuant to Local Rule 7.3(a), Plaintiff's counsel contacted Defendants to confer on the relief requested herein and asked Defendants

to notify Plaintiff of any objection. As of filing, Plaintiff has not received any objection from Defendants.

6. This motion is not made in bad faith or for the purpose of delay, and it will not unduly prejudice any of the parties.

7. For these reasons, Plaintiff respectfully requests that this Court grant a 7-day extension of time to file his reply brief.

WHEREFORE Plaintiff respectfully requests this Honorable Court grant his Motion for Extension of Time to Reply in Support of Plaintiff's Motion for Protective Order, up to and including May 30, 2025, and any other relief this Court deems just.

RESPECTFULLY SUBMITTED,

RICHARD HORTON

/s/ Michele Berry
One of Plaintiff's Attorneys

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Alyssa Martinez, an attorney, certify that a copy of the foregoing was filed electronically on May 23, 2025 using the Court's CM/ECF System, and that notice of this filing was sent that same day to the other parties to this case by operation of the Court's CM/ECF System.

/s/ Alyssa Martinez
One of Plaintiff's Attorneys